

BRETT D. SHERMAN
Member NY Bar

SHERMAN & TICCHIO PLLC

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JAMES R. TICCHIO
Member NY & NJ Bars

60 East 42nd Street • New York, NY 10165
(212) 324-3874

March 1, 2022

Via ECF

Hon. Taryn A. Merkl, U.S.M.J.
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: **Rodriguez v. American Express Company et al**
Case No. 21-cv-05647
*Notice of Settlement in Principle between Plaintiff and
Citibank, N.A.*

Dear Judge Merkl:

This firm represents Plaintiff in the above-referenced action (“Action”). On behalf of Plaintiff and Citibank, N.A. (“Citi” together the “Parties” or “Settling Parties”), I write to inform the Court that these Parties have reached a confidential settlement in principle of Plaintiff’s claims against Citi in the Action. So that the Settling Parties have sufficient time to (a) finalize and execute a settlement agreement (“Agreement”) and (b) assure that all conditions of the Agreement are satisfied, Plaintiff and Citi jointly and respectfully request until May 2, 2022, to file a joint stipulation and proposed order dismissing all claims against Citi with prejudice.

Respectfully submitted,



Brett D. Sherman